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U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 3:19-cv-30056-MGM \*SEALED\*

██████████, an individual,  
Plaintiff,

v.

UMass-Amherst, a Massachusetts public institution of more than 300 employees,  
Dr. Derek Lovley, an individual,  
Dr. Toshiyuki Ueki, an individual,  
Dr. John Lopes, an individual,  
Defendants.

Dated August 22, 2019

MOTION FOR LEAVE TO PROCEED USING A PSEUDONYM  
AND TO REDACT SENSITIVE DATA

The August 19, 2019 order (Dkt. No. 20) informed Plaintiff that she did not meet the burden of establishing that her August 12, 2019 second motion for impoundment was meritorious and therefore this latter request was denied. However, Plaintiff's fear of additional immediate irreparable serious harm exposed in the memorandum in support of the aforesaid second impoundment motion remains substantial and compels her to move for replacing all pleadings already filed in the instant case with versions in which Plaintiff's name was changed with a pseudonym while sensitive data (date of birth, email address, etc.) were redacted.

Respectfully submitted,  
/s/ ██████████, Pro Se

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